

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

In Re:

RAY A. PERRIN

Debtor.

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Case No. 19-41791

**MOTION TO EMPLOY MARK E. MEYER & THE LAW OFFICE OF MARK E. MEYER**  
**AS SPECIAL COUNSEL FOR DEBTOR**

COMES NOW Ray A. Perrin, (“Debtor”) for his Motion to Employ Mark E. Meyer and The Law Office of Mark E. Meyer as special counsel for the Debtor. In support of this Motion, Debtor respectfully represents as follows:

1. The Debtor filed his petition for relief under Chapter 13 of the Bankruptcy Code on July 16, 2019.
2. By this Motion, the Debtor seeks to employ and retain Mark E. Meyer and The Law Office of Mark E. Meyer, as his special counsel, pursuant to 11 U.S.C. Section 327(a) and Section 327(e).
3. The employment of Mark E. Meyer and The Law Office of Mark E. Meyer as special counsel for the Debtor is necessary and beneficial to the Debtor and the bankruptcy estate because he has the expertise and ability to represent Debtor in his
4. The employment of Mark E. Meyer and The Law Office of Mark E. Meyer as special counsel for the Debtor is necessary and beneficial to the Debtor and the bankruptcy estate because she has the expertise and ability to represent the Debtor in his claim against Jason Dunlop and his company, JD Biz LLC. An Affidavit of Mark E. Meyer is attached to this Motion as Exhibit A.
5. It is in the best interest of the Debtor that he employ Mark E. Meyer and The Law Office of Mark E. Meyer to render the foregoing professional services.
6. Mark E. Meyer and The Law Office of Mark E. Meyer have agreed to an hourly fee of \$250.00 per hour for their services pursuant to the terms of this Motion.

7. Mark E. Meyer and The Law Office of Mark E. Meyer do not have any connection with the Debtor, the United States Trustee, or any person employed in the Office of the United States Trustee, and do not hold or represent any interest adverse to the Debtor with respect to the matters on which they are to be employed as disclosed in the Affidavit.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order authorizing the Debtor to employ and retain Mark E. Meyer and The Law Offices of Mark E. Meyer as special counsel as detailed herein, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Dana B. Wilders

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ATTORNEYS FOR DEBTOR

#### NOTICE

Notice is given to creditors and parties in interest that they have until August 4, 2022 to file a written objection to Debtor's Motion. A copy of the objection must be served on Debtor's counsel at the address below, the U.S. Trustee, and on any parties registered through the Court's ECF system. Documents can be filed electronically at <http://ecf.mowb.uscourts.gov>, and by mail to the Court at U.S. Bankruptcy Court, 400 E. 9<sup>th</sup> Street, Kansas City, Missouri 64106. For information about electronic filing, go to [www.mow.uscourts.gov](http://www.mow.uscourts.gov) or call the Court's HELP line at 1-800-466-9302. If an objection is filed, the Court will schedule a hearing on the objection. If no objections are timely filed, the Court may enter an Order approving Debtor's Motion without further notice to creditors.

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Employ Mark E. Meyer and The Law Office of Mark E. Meyer as special counsel for Debtor was either emailed or mailed on this 14<sup>th</sup> day of July, 2022, to all creditors and parties in interest listed on the Court's ECF noticing system and to all parties listed on the Court's mailing matrix.

/s/ Dana B. Wilders

Dana B. Wilders